

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TONJA FRANCES BROWN, an individual,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION  
dba COSTCO WHOLESALE, a foreign  
corporation; DOE INDIVIDUALS I through X;  
and ROE ENTITIES I through X,

Defendants.

Case No.: 3:22-cv-00208-ART-CLB

**ORDER GRANTING**

**STIPULATION TO CONTINUE  
JOINT PRETRIAL  
DISCLOSURE DEADLINE  
UNTIL 30 DAYS AFTER  
RULING ON MOTIONS FOR  
SUMMARY JUDGMENT**

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court to continue the Joint Pre-Trial Disclosure deadline, currently set for June 1, 2023, until this Court hears and renders its ruling on Plaintiff's pending 1.) Motion for Partial Summary Judgment Regarding Defendants' Duty and Breach [35]; and 2.) Plaintiff's Motion for Partial Summary Judgment Regarding Causation and Past Medical Damages And Bills [36], filed May 1, 2023. Defendant's Opposition to the pending motions was extended through June 6, 2023 and Defendants have provided Plaintiff with a courtesy 2 week extension for Plaintiff to submit her replies.

Furthermore, the parties attempted mediation on May 17, 2023, and the parties are still in settlement negotiations.

WHEREFORE, the parties respectfully request that this Court postpone the remaining trial deadlines until the pending Motions for Summary Judgment have been heard and a ruling has been ordered.

**Respectfully Submitted by:**

DATED this 1st day of June 2023.

**VALIENTE MOTT, LTD.**

*/s/ James A. Trummell, Esq.*

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*Attorneys for Plaintiff*

**Approved to Form and Content by:**

DATED this 1st day of June 2023.

**ROBISON, SHARP, SULLIVAN & BRUST**

*/s/ Michael E. Sullivan*

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*Attorneys for Defendant*

For good cause appearing, the parties' Joint Pretrial Order shall be due 30 days after the Court rules on the pending motions for summary judgment.

**IT IS SO ORDERED:**



UNITED STATES MAGISTRATE JUDGE

DATED: June 2, 2023

# RE: reg signature SAO-PTO Brown v Costco

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From: **Mike Sullivan** | msullivan@rssblaw.com

Thursday, Jun 1 at  
4:21 PM

To: **Gina Cougill** | Gina@valientemott.com, **Karla Sullivan** | ksullivan@rssblaw.com, **Blanca Driver** | BDriver@rssblaw.com

Cc: **Jim Trummell** | Jim@valientemott.com, **Christina Espinosa** | christina@valientemott.com

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It looks good and yes, you may sign my name. I believe (not positive so we should both check) that there is a standing order that allows for the pre trial report to be filed 30 days after dispositive motions have been ruled on, so hopefully, we are ok. Thanks, MIKE. Please have Jim call me one of these days. Thanks, MIKE S 775 329 3151

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